

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division**

CSX TRANSPORTATION, INC.,  
individually and on behalf of NORFOLK  
& PORTSMOUTH BELT LINE  
RAILROAD COMPANY,

*Plaintiff,*

v.

NORFOLK SOUTHERN RAILWAY  
COMPANY, *et al.*,

*Defendants.*

Case No. 2:18-cv-530

**DEFENDANTS' JOINT MOTION TO FILE DOCUMENTS UNDER SEAL**

Pursuant to Local Civil Rule 5(C), Defendants Norfolk & Portsmouth Belt Line Railroad Company (“NPBL”) and Norfolk Southern Railway Company (“NSR”) (collectively, “Defendants”), by counsel, move the Court for an order sealing Defendants’ unredacted Reply in Support of Joint Motion to Compel Depositions of CSXT Witnesses (“Reply in Support of Joint Motion to Compel”), together with Exhibits A and C to Defendants’ Reply in Support of Joint Motion to Compel. In support of this Motion, Defendants submit contemporaneously a nonconfidential Reply in Support of Motion to File Documents Under Seal. Defendants have also filed herewith a Notice of Filing Sealing Motion as required by Local Rule 5(C). Defendants waive oral argument on this motion. A proposed order granting the requested relief is attached as **Exhibit A**.

Dated: February 10, 2021

Respectfully submitted,

**NORFOLK & PORTSMOUTH BELT LINE  
RAILROAD COMPANY and NORFOLK  
SOUTHERN RAILWAY COMPANY**

/s/ W. Ryan Snow

James L. Chapman, IV, Esq.

W. Ryan Snow, Esq.

Darius K. Davenport, Esq.

David C. Hartnett, Esq.

Alexander R. McDaniel, Esq.

CRENSHAW, WARE & MARTIN, P.L.C.

150 W. Main Street, Suite 1500

Norfolk, Virginia 23510

Telephone: (757) 623-3000

Facsimile: (757) 623-5735

Email: jchapman@cwm-law.com

Email: wrsnow@cwm-law.com

Email: ddavenport@cwm-law.com

Email: dhartnett@cwm-law.com

Email: amcdaniel@cwm-law.com

*Attorneys for Norfolk and Portsmouth Belt Line  
Railroad Company*

/s/ Alan D. Wingfield

Alan D. Wingfield (VSB No. 27489)

Michael E. Lacy (VSB No. 48477)

Massie P. Cooper (VSB No. 82510)

TROUTMAN PEPPER HAMILTON SANDERS, LLP

1001 Haxall Point

Richmond, Virginia 23219

Telephone: (804) 697-1200

Facsimile: (804) 698-6061

Email: alan.wingfield@troutman.com

Email: michael.lacy@troutman.com

Email: massie.cooper@troutman.com

John C. Lynch (VSB No. 39267)

Kathleen M. Knudsen (VSB No. 90845)

TROUTMAN PEPPER HAMILTON SANDERS LLP

222 Central Park Avenue, Suite 2000

Virginia Beach, VA 23462

Telephone: (757) 687-7759  
Facsimile: (757) 687-7510  
Email: john.lynch@troutman.com  
Email: kathleen.knudsen@troutman.com

Monica McCarroll (VSB No. 45622)  
REDGRAVE LLP  
14555 Avion Parkway, Suite 275  
Chantilly, Virginia 20151  
Telephone: (703) 592-1154  
Facsimile: (703) 230-9859  
Email: MMcCarroll@redgravellp.com

Tara L. Reinhart  
John R. Thornburgh II  
Thomas R. Gentry  
SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM LLP  
1440 New York Avenue, N.W.  
Washington, DC 20005  
Telephone: (202) 371-7000  
tara.reinhart@skadden.com  
john.thornburgh@skadden.com  
thomas.gentry@skadden.com

*Attorneys for Norfolk Southern Railway Company*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 10, 2021, I electronically filed a copy of the foregoing with the Clerk of Court using the CM/ECF system, which sent a notification of such filing (NEF) to the registered participants as identified on the NEF to receive electronic service, including:

Robert W. McFarland, Esq.  
Benjamin L. Hatch, Esq.  
V. Kathleen Dougherty, Esq.  
McGuireWoods LLP  
World Trade Center  
101 West Main Street, Suite 9000  
Norfolk, Virginia 23510-1655  
Telephone: (757) 640-3716  
Facsimile: (757) 640-3930  
Email: rmcfarland@mcguirewoods.com  
Email: bhatch@mcguirewoods.com  
Email: vkdougherty@mcguirewoods.com

J. Brent Justus, Esq.  
Ashley P. Peterson, Esq.  
McGuire Woods LLP  
800 East Canal Street  
Richmond, Virginia 23219-3916  
Email: bjustus@mcguirewoods.com  
apeterson@mcguirewoods.com

*Attorneys for CSX Transportation, Inc.*

/s/ Alan D. Wingfield  
Alan D. Wingfield (VSB No. 27489)  
Michael E. Lacy (VSB No. 48477)  
Massie P. Cooper (VSB No. 82510)  
TROUTMAN PEPPER HAMILTON SANDERS, LLP  
1001 Haxall Point  
Richmond, Virginia 23219  
Telephone: (804) 697-1200  
Facsimile: (804) 698-6061  
Email: alan.wingfield@troutman.com  
Email: michael.lacy@troutman.com  
Email: massie.cooper@troutman.com

*Attorneys for Norfolk Southern Railway Company*